

United States District Court  
for the

FILED

JUN - 5 2020

WESTERN

DISTRICT OF

OKLAHOMA

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY JSP DEPUTY

UNITED STATES OF AMERICAN,

v.

CHRISTOPHER STEVEN LEDBETTER,

Case No:

M-20-255-SM

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 4, 2020, in the county of Oklahoma, in the Western District of Oklahoma, the defendant  
violated:

Code Section

Offense Description

18 U.S.C. § 922(o)(1)

Possession of Machine Gun

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent James A Anderson, of the Federal Bureau of Investigation which is incorporated and made a part hereof by reference.

☐ Continued on the attached sheet.  
JAMES A. ANDERSON  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: 6/5/20City and State: Oklahoma City, Oklahoma  
Judge's signatureSUZANNE MITCHELL, US Magistrate Judge  
Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA

v.

CHRISTOPHER STEVEN LEDBETTER

Case No. M-20-255-SM

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR COMPLAINT**

I, James A. Anderson, Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since July 20, 1997. I am currently assigned to the Joint Terrorism Task Force of the Oklahoma City field office. As a Special Agent, I investigate violations of federal criminal law.

2. As a Special Agent, I have conducted and participated in a variety of criminal and national security investigations, including investigations associated with foreign counterintelligence, counterterrorism, murder, bank robberies, fugitives, financial crimes, computer crimes, as well as other violent criminal acts.

3. I make this affidavit in support of a criminal complaint for **CHRISTOPHER STEVEN LEDBETTER (“LEDBETTER”)**. Based on my training and experience and the facts as set forth in this Affidavit, I believe there is probable cause to believe that **LEDBETTER** knowingly committed the following offense against the

United States, to wit: Title 18, United States Code, Section 922(o)(1), possession of a machine gun.<sup>1</sup>

4. The facts in this affidavit are based on knowledge obtained through my direct participation in this investigation, information provided to me by other law enforcement officers, agents, and witnesses, and a review of documents and records. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a criminal complaint.

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<sup>1</sup> Under 18 U.S.C. § 922(o), it is a federal crime for any person to transfer or possess a machinegun. For purposes of a criminal violation under 18 U.S.C. § 922(o), 18 U.S.C. § 921(a)(23) adopts the definition of “machinegun” as set forth in the National Firearms Act, 26 U.S.C. § 5845(b). According to 26 U.S.C. § 5845(b)

The term “machinegun” means any weapon which shoots, is designed to shoot, or can readily be restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

26 U.S.C. § 5845(b). Accordingly, based on my training and experience, an AK-47-style carbine which has been modified to shoot in fully automatic mode meets the definition of “machinegun” for purposes of 18 U.S.C. § 922(o).

**FACTS SUPPORTING PROBABLE CAUSE**

5. In March 2020, FBI learned that **LEDBETTER** might be in possession of a fully automatic Avtomat Kalashnikova (“AK-47”) style carbine (machine gun).

6. On March 4, 2020, an investigator with the Oklahoma Highway Patrol (OHP) provided FBI with a video that OHP accessed and downloaded from **LEDBETTER**’s publicly-accessible Facebook page. The video depicts **LEDBETTER** engaging in military-style tactical training in a partially wooded field. The video is a first-person perspective from a camera mounted on a person’s head. The person recording the video is shooting what appears to be a fully automatic AK-47-style carbine (machine gun). This individual is wearing a tan glove on his left hand and his voice can be heard. As part of this investigation, I have reviewed multiple videos in which **LEDBETTER** can be heard speaking. In some of these videos, **LEDBETTER** is also wearing a tan glove on his left hand. Additionally, **LEDBETTER** is known to wear a tactical helmet with a GoPro-type camera mounted to the front. I believe **LEDBETTER** to be the person shooting the AK-47 and speaking in this video.

7. On April 30, 2020, Affiant observed a news article on the Internet titled, *“Protesters turn out at Kansas Capitol Thursday.”* The article, from KMBC News 9 (ABC), dated April 23, 2020, reflected a news story about a group of protesters that showed up at the Capitol Building in Topeka, Kansas, wherein they were protesting recent “stay-at-home” orders issued by the Kansas Governor as a result of the COVID-19

pandemic. In the article, **LEDBETTER** is quoted as stating, “As you can see, I got weapons right on me. I got illegal weapons on me. But none of them are going to do anything because I’m a peaceful person. Right?” The article also had a video attached to it wherein the local News 9 Reporter was talking with **LEDBETTER**. The video depicts **LEDBETTER** with an AK-47-style carbine, wearing tactical gear, a helmet, and carrying multiple magazines.

8. On May 4, 2020, I observed a video posted on **LEDBETTER**’s publicly-accessible Facebook page, dated May 3, 2020 at 2:34 PM, located at URL <https://www.facebook.com/christopher.ledbetter.9>, display name “Christopher Ledbetter,” attributed to Facebook Profile ID 100003681487662. The video depicted approximately eight individuals engaged in what appeared to be tactical “room entry” training commonly known as Close Quarters Battle or “CQB.” The video appears to be from a camera mounted on the head of an individual. This individual appears to be firing an AK-47-style carbine and is firing in a fully automatic mode. The individual who appeared to be videoing can be heard speaking. Investigating agents familiar with **LEDBETTER** believe that the shooter's voice is **LEDBETTER**’s. Additionally, the person firing the fully automatic firearm has tattoos on his left arm that are consistent with tattoos I have observed on **LEDBETTER** in other photographs and videos. The first paper target, which is shot with full auto, is a silhouette labeled “POLICE” with a badge drawn over the left chest (where a police officer would typically wear his/her badge). The video was also posted on YouTube, entitled “Training,” dated May 4,

2020. That video is attributed to YouTube subscriber “Christopher Ledbetter” and was found at the URL: <https://www.youtube.com/channel/UCb0rdPvyxs3tSK6GrdkrwqA>.

9. On May 22, 2020, Affiant observed a publicly accessible YouTube video posted on the Internet at URL:

<https://www.youtube.com/watch?v=RrAtwfiPwKY&feature=youtu.be>. The video was dated May 22, 2020, and was titled “Update. Liberty or Death.” It was posted on the YouTube page corresponding to the display name “Christopher Ledbetter,” at:

<https://www.youtube.com/channel/UCbOrdPvyxs3tSk6GrdkrwqA>. **LEDBETTER** can be seen standing near the McLoud Police Department in McLoud, Oklahoma. He is wearing camouflage pants, a tactical helmet with a mounted camera, and holding an AK-47-style carbine.

10. FBI has also reviewed Facebook content (between the period of October 1, 2018 through May 6, 2020) associated with **LEDBETTER**’s Facebook page, Facebook User ID (UID) 100003681487662, found at URL

<http://www.facebook.com/christopher.ledbetter.9>. This Facebook account has numerous photos of **LEDBETTER** uploaded by the accountholder, voice messages from the account holder which I believe to be **LEDBETTER**’s voice, and videos posted by the accountholder which depict **LEDBETTER**.

11. FBI located the videos previously described in paragraphs 6 and 8 while reviewing the Facebook content. That content corroborates that **LEDBETTER** posted the referenced videos.

12. FBI's review of the Facebook return also provided numerous conversations in which **LEDBETTER** discusses fully automatic weapons. Among other things, investigators observed the following:

- a. On February 29, 2020 at 01:30:27 UTC, **LEDBETTER** replied to a comment: "I'm still man enough to use machine guns and explosives here without a cute uniform, roll out and do your job plz."
- b. The following conversation took place via Facebook Messenger between **LEDBETTER** (UID: 100003681487662) and FBU<sup>2</sup> 7 from March 7, 2020 at 00:26:45 UTC to March 7, 2020 at 00:31:49 UTC:
  - Author: FBU 7  
Sent: 2020-03-07 00:26:45 UTC  
Body: I dont remember how we met, but im very thankful
  - Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:28:29 UTC  
Body: 😊 you literally commented on one of my comments on a post "this guy I will boog<sup>3</sup> with". Hahaha hell yeah bro can't keep the goons from finding each other lmao
  - Author: FBU 7  
Sent: 2020-03-07 00:29:29 UTC  
Body: Fuck yes. If it actually kicks off and if everyone gets together, itll be fun as shit till we actually start shooting

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<sup>2</sup> FBU refers to "Facebook User." Facebook records provide the name of the individuals in the comments and/or messages. Their names are being redacted to protect their identities.

<sup>3</sup> I believe, based on the totality of the conversation and investigation, "boog" is short for "boogaloo," which refers to a future civil war.

- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:31:49 UTC  
Body: From my view over here that will be better than waiting to get offed everyday 😊 this transition part is the hardest shit. At least then it is what it is no more maybes. And hey still be a blast while you're getting them just sucks when they get any one of us ha

- c. On March 14, 2020 at 23:54:09 UTC, **LEDBETTER** replied to a comment by FBU 8: “cool excuses, still get fucked. I'll be the one driving without my seatbelt on with a select fire and grenades pussy. You can't make enough money so you rob shit the legal way "for good" instead of the illegal way, motivated by cowardice and laziness nothing more.”<sup>4</sup>
- d. On April 20, 2020 at 18:51:16 UTC, **LEDBETTER** commented on a post: “I keep the select fire and explosives inside cause I'm not a good dick sucking bitch.”
- e. On April 21, 2020 at 03:43:42 UTC, **LEDBETTER** replied to a comment by Facebook username FBU 9: “do it. I like carrying a select fire and grenades just to make sure I'm always illegal lol.”
- f. On April 24, 2020 at 22:15:10 UTC, **LEDBETTER** sent the following message to FBU 10: “Been trying to do all I can and get all the extra guys I can, but it's a losing battle trying to fight for people that won't stand up for

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<sup>4</sup> Based on my training and experience, your Affiant believes that select fire, or selective fire, is a firearm with the capability of firing in multiple modes—typically a semi-automatic mode (one shot per trigger pull) and at least one fully automatic mode (burst or unrestricted).



themselves or don't want you to. Like here we can run around with automatics and explosives and tell the cops to suck our dicks because they know we will die for it at this point. But then we have offered shop owners protection to open back up and most of them decline just cause they are scared of breaking the law. If the bend the knee there for this and Duncans family gets fucked more with no protection, they will be getting visited sooner or later by those that are willing to take a stand.”

- g. On May 1, 2020 at 23:38:25 UTC, **LEDBETTER** replied to a comment by FBU 11: “ah I see. Na I've never had an SBR/SMG. Just run a select fire and a few grenades EDC lol.”

13. I caused a search to be conducted of the Bureau of Alcohol, Tobacco, Firearms and Explosives's (ATF) federal licensing system. That search determined that **LEDBETTER** does not have the required licenses to possess a machine gun.

14. On June 4, 2020, **LEDBETTER** was arrested by FBI Agents in Oklahoma City pursuant to a state arrest warrant. While being taken into custody, for officer safety and public safety, FBI agents asked **LEDBETTER** whether there were any explosives in the vehicle. Agents told **LEDBETTER** they appreciated him being straightforward. **LEDBETTER** gestured toward his vehicle (a 2017 blue Jeep Wrangler, Oklahoma tag HXT771) with his head and stated, “I've always been straight forward. That rifle in there is select fire. You have them.” FBI agents understood his statement to mean that he had a

fully automatic weapon in his vehicle, and if government agents could have them, then he should also be able to have them.

15. Based on the exigency, in part due to **LEDBETTER**'s previous statements concerning his manufacturing and carrying of grenades and explosive devices, his prior possession of a fully automatic AK-47-style carbine, and his acknowledgement that he had a "select fire" in his blue Jeep Wrangler Sport, FBI did a limited search of the vehicle. FBI located two carbines, including the AK-47-style carbine and an improvised launcher loaded with an unknown munition.

16. Additionally, a federal warrant was secured for the search and seizure of **LEDBETTER**'s 2017 blue Jeep Wrangler Sport (Oklahoma tag HXT771). Pursuant to the search, agents seized an AK-47-style carbine, serial number GV 2300.

17. On June 4, 2020, an ATF Special Agent examined the AK-47-style carbine (serial number GV 2300) found in **LEDBETTER**'s vehicle. He advised the receiver was manufactured by Childers Guns in Fairmont, West Virginia. The ATF agent function-tested the gun and found it capable of functioning as a machine gun. The ATF agent advised that it is a firearm with the capability of firing in multiple modes, in a semi-automatic mode (one shot per trigger pull) and at least one fully automatic mode (burst or unrestricted).

18. On June 4, 2020, FBI Agents interviewed **LEDBETTER** subsequent to his arrest on state charges. During the voluntary interview, **LEDBETTER** admitted, among other things, that he possessed an illegal select fire AK-47-style carbine.

**CONCLUSION**

19. Based on the forgoing, I believe there is probable cause to believe that on June 4, 2020, in Oklahoma City, Oklahoma, in the Western District of Oklahoma, **CHRISTOPHER STEVEN LEDBETTER** did knowingly possess a machinegun, as defined in Title 18, United States Code, Section 921(a)(23), that was not registered to him in violation of Title 18, United States Code, Section 922(o).

**FURTHER, YOUR AFFIANT SAYETH NOT.**

Respectfully submitted,



James A. Anderson  
Special Agent  
Federal Bureau of Investigations

Subscribed and sworn to before me on June 5, 2020



HONORABLE SUZANNE MITCHELL  
UNITED STATES MAGISTRATE JUDGE